

**Federal Defenders  
OF NEW YORK, INC.**

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February 4, 2016

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 518  
New York, NY 10007

Re: **United States v. Jeff C. Yin, et al**  
**Docket No. 15 Cr. 706 (VSB)**

Dear Judge Broderick:

I write to request a bail modification of one of the conditions of release for Jeff Yin to allow him to move to California and be confined to his mother's house there. Jeff's pre-trial officer Joshua Rothman consents to this request, but the government objects.

As your honor is aware, Mr. Yin was arrested in New York while on a business trip and has no family or close friends here. He is not wealthy and, while he is currently renting the cheapest apartment he could find, the \$2,000 per month rent is causing him significant financial hardship. While he has been looking for a job, he has been unable to find any job at all, much less one that would allow him to afford his rent. This rent is simply not sustainable for him.

Additionally, Mr. Yin's mother Jillian and younger brother Jerry live in California. That Jeff is in New York while Jerry is in California is causing his family significant emotional hardship. His mother is torn between being in New York to support one son as his case moves to trial and being in California to support her other son, who is only 14 years old, and needs a parent at home.

Jeff's mother is more than willing to have his home confinement transferred to her home in Yorbalinda. In California, Jeff would still be under all the same stringent bail conditions he is under now. He will be heavily supervised by pre-trial in California and will have a reporting officer in California who would, if necessary, seek a warrant for his arrest, and immediately report any problems to New York. New York pre-trial

originally recommended that Jeff live with his mother in California, and remains unconcerned that California pre-trial would more than adequately handle his case.

If the court has any questions, we are available for oral argument. Thank you for considering this request.

Sincerely,

/s/

Sabrina Shroff & Allegra Glashausser  
(212) 417-8700

cc. AUSAs Janis M. Echenberg, Daniel C. Richenthal, Rahul Mukhi